



CSDVRS, LLC
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November 19, 2013

Via Courier and Electronic Filing

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street SW
Washington, D.C. 20554

**RE: Annual Report of CSDVRS, LLC for Continued Certification as a VRS Provider
CG Docket Nos. 03-123 and 10-51 and Request for Confidential Treatment: CG Docket
Nos. 10-51 and 03-123**

Dear Ms. Dortch:

Pursuant to 47 C.F.R. §64.606(g), CSDVRS, LLC (d/b/a ZVRS, “ZVRS”) hereby submits its annual report as a provider of video relay services (“VRS”) that is eligible for compensation from the Interstate Telecommunications Relay Service (“TRS”) Fund. **Attached is a copy of the report in its confidential form and is not for public inspection.** The redacted version of the report has been electronically filed in the Commission’s dockets.

Pursuant to 47 C.F.R. § 0.459, ZVRS requests confidential treatment for the company-specific, highly sensitive and proprietary commercial information in the exhibits accompanying the report and withhold that information from any public inspection. The confidential information has been redacted from the version electronically filed with the Commission. In addition, the confidential information constitutes highly sensitive commercial information that falls within Exemption 4 of the Freedom of Information Act (“FOIA”).

In support of this request and pursuant to Section 0.459(b) of the Commission's rules, ZVRS states as follows:

1. Identification of the specific information for which confidential treatment is sought.

ZVRS requests confidential treatment with respect to the confidential information redacted from the version filed electronically with the Commission.

2. Identification of the circumstance giving rise to the submission.

ZVRS is providing updated corporate proprietary information per the requirements of 47 C.F.R. §64.606(g).

3. Explanation of the degree to which the information is commercial or financial or contains a trade secret or is privileged.

The confidential information in the exhibits of ZVRS' report is highly sensitive commercial information specific to the operational, functional and technological capabilities of ZVRS. This information is therefore safeguarded from competitors and is not made available to the public.

4. Explanation of the degree to which the information concerns a service that is subject to competition.

The confidential information involves TRS, a highly competitive service.

5. Explanation of how disclosure of the information could result in substantial competitive harm.

Disclosure of the redacted information could cause substantial competitive harm to ZVRS, because other VRS providers would have access to the company's critical infrastructure, operations and organizational information, and providers could use such information to compete against ZVRS and undermine the company's position in the VRS marketplace.

6. Identification of any measures taken to prevent unauthorized disclosure.

ZVRS routinely treats the redacted information as highly confidential and exercises significant care to ensure that such information is not disclosed to its competitors or the public.

7. Identification of whether the information is available to the public and the extent of any previous disclosure of the information to third parties.

ZVRS does not make the redacted information available to the public, and this information has not been previously disclosed to third parties.

8. Justification of the period during which the submitting party asserts that the material should not be available for public disclosure.

ZVRS requests that the redacted information be treated as being confidential on an indefinite basis as it cannot identify a certain date at which this information could be disclosed without causing competitive harm to ZVRS.

Sincerely,

/s/

Jeff Rosen
General Counsel

Attachment

cc: Gregory Hlibok, Chief, Disability Rights Office (via electronic delivery)
TRSreports@fcc.gov (via electronic delivery)